REMARKS

In response to the Office Action mailed on June 28, 2007, Applicants respectfully request reconsideration. To further the prosecution of this Application, Applicants submit the following amendments as well as remarks discussing patentability of rejected and newly added claims.

Claims 1-51 are original claims filed in the subject Application. Claims 52-55 are being added by way of this amendment. No new matter was added to the application when adding the new claims.

The following remarks address the rejections of pending claims as set out in the present Office Action as well as patentability of newly added claims. Applicants respectfully request reconsideration.

Applicants encourage the Examiner to call the below named Attorney if such a call will help expedite prosecution of this application to issuance.

Rejection of Claims 1-46 under 35 U.S.C. §103(a)

The Examiner has rejected original claim 1 under 35 U.S.C. §103(a) based on Grace (U.S. Publication 2004/0075680), Chang (U.S. Publication 2004/0051731), and Benhase (U.S. Publication 2004/0243945). The Office Action likens elements in these references to those in claim 1 to reject the claimed invention.

Applicants have amended claim 1 in accordance with certain limitations in previously pending claim 6 to more clearly distinguish the claimed invention over the cited prior art.

Additionally, Applicants have reviewed the Grace disclosure and respectfully submit, contrary to observations presented in the pending office action, that amend claim 1 includes patentable limitations over the cited references.

For example, amended claim 1 recites that displaying a first column of icons (e.g., managed software resources) and a second column of icons (e.g., storage resources) as well as corresponding relationships paths between icons in the columns.

Applicants respectfully assert that the office action uses hindsight to reject the claimed invention because the claimed invention includes limitations not found in any of the references.

For example, amended claim 1 recites: "graphically displaying a first relationship view of the selected managed entity and at least one other managed entity of the storage area network based on use of columns of icons, a first column including at least two icons graphically representing a managed software entity, a second column including at least two icons graphically representing a managed storage entity, at least a portion of the sequence of relationships being graphically represented by relationship paths between icons in the first column and icons in the second column."

None of the references teaches or suggests displaying multiple relationship paths between icons in a first column and icons in a second column as recited by the claimed invention. For example, Grace and Benhase show no relationships paths whatsoever. Thus, neither of these references teaches or suggests this claim limitation. Chang shows relationship paths only between icons in a single top-down hierarchy of resources. This is not equivalent to or

suggestive of displaying relationship paths between icons in different columns as in the claimed invention. Accordingly, this aspect of the claimed invention distinguishes it over the cited prior art.

Additionally, note that amended claim 1 recites: "graphically displaying a container encompassing at least one of the first column of icons and the second column of icons." To support the rejection of this claim limitation (e.g., as in previously pending claim 6), the office action cites window 606 in FIG. 6 of Grace. Applicants respectfully submit that the window 606 in Grace does not encompass multiple icons. Accordingly, Grace does not teach or suggest this claim limitation.

Note also that Chang in FIG. 19 also does not include a graphical container of a collimated set of multiple displayed icons. Accordingly, Applicants respectfully submit that Chang also does not teach or suggest the claimed invention.

Display of the container and collimated set of icons according to the claimed invention enables a user to easily identify groupings of related icons (and corresponding managed entities or resources) on a display screen.

For the reasons stated above, Applicants submit that claim 1 is patentably distinct and advantageous over the cited prior art, and the rejection of claim 1 under 35 U.S.C. §103 should be withdrawn. Accordingly, allowance of claim 1 is respectfully requested. If the rejection of claim 1 is to be maintained, Applicants respectfully request that it be pointed out with particularity where the cited prior art discloses the above limitations.

By virtue of dependency with respect to claim 1, claims 2-14 should also be in allowable condition as well.

Independent claim 15 recites displaying of one or more software managed entities in a first column and one or more hardware managed entities in a corresponding second adjacent column. Additionally, the claim recites displaying associations between such entities via relationship paths between icons in the first column and icons in the second column. Based on reasons as discussed above for claim 1, the recited reference does not teach or suggest aspects of the claimed invention as in claim 15. By virtue of dependency, claims 16-21 should also be in allowable condition as well.

Claims 22-35 parallel method claims 1-21 and, for applicable reasons as stated above, should be in condition for allowance.

For applicable reasons as discussed above for claim 1, claims 45 and 46 should be in condition for allowance as well.

Claim 43 recites similar limitations as claim 1 and yet also recites a third column including one or more icons to represent yet other managed entities in a storage area network environment. For applicable reasons as discussed above, Applicants respectfully submit that claim 43 is in condition for allowance. By virtue of dependency, claim 44 should also be in allowable condition as well.

Applicants respectfully submit that the dependent claims include further limitations not taught or suggested by the cited prior art. For example, claim 3 recites "providing a viewer controlled device supporting movement of a corresponding pointer on the display screen; and highlighting a relationship path in a vicinity of the pointer on the display screen to emphasize a corresponding relationship between managed entities represented by icons in the first and second columns." The office action suggests that an expandable icon is equivalent to a relationship path as in the claimed invention. Applicants

respectfully submit that an icon as in the cited prior art is not equivalent to a relationship path between icons as recited by the claimed invention.

The office action also cites FIG. 3-5 of Benhase and FIG. 19 of Chang. There is no discussion in the office action as to how this cited reference teaches or suggests highlighting of a relationship path as recited by the claimed invention. Accordingly, Applicants respectfully request allowance of claim 3.

Claim 4 recites "allocating a visual region in relation to a corresponding icon to receive input commands; and in response to detecting receipt of a generated input command in the visual region by a user, expanding the first relationship view of managed entities in the storage area network into an expanded relationship view including a third column of multiple icons disposed between the first column and the second column, relationship paths being displayed between icons in the first column and the third column and between icons in the third column and the second column, the icons in the third column representing other previously hidden managed entities associated with the storage area network." Applicants respectfully traverse the rejection of claim 4 because none of the cited paragraphs in Grace, Chang or Benhase used to reject the claimed invention teach or suggest a technique equivalent to this claim limitation.

For example, the cited prior art does not illustrate an expanded view including an extra column (e.g., third column) between a first column and a second column. Instead, the cited passages describe use of a hierarchical tree as known in the prior art. Moreover, the cited passages do not recite the additional relationship paths between icons in the third column and the first and second column that are present in the expanded view. Thus, the claimed invention enables the viewer to selectively expand a topology and view additional

columns of managed entities and corresponding relationships that were not present in a previous viewing. The cited prior art recites no such functionality.

The office action also cites FIG. 3-5 of Benhase and FIG. 19 of Chang. There is no discussion in the office action as to how this cited reference teaches or suggests the use of the third column and related limitations as recited by claim 4. Accordingly, Applicants respectfully request allowance of claim 4.

Claim 7 recites displaying a second container to encompass the for container. Applicants respectfully submit that FIG. 6 of Grace does not illustrate a container in a container as in the claimed invention. The office action also cites FIG. 3-5 of Benhase and FIG. 19 of Chang. There is no discussion in this cited prior art regarding containers within containers as recited by claim 7. Accordingly, Applicants respectfully request allowance of claim 7.

Claim 8 recites "from the first relationship view including at least the first column and second column displayed in a first area of a display screen, detecting a user selection of a particular icon in the first area; and in response to detecting the user selection of the particular icon in the first area, generating a second relationship view in a second area of the display screen, the second relationship view including a presentation of relationships between a managed entity associated with the particular icon and other associated nearest neighboring managed entities in the storage area network." The office action recites paragraph 48 and 56 of Grace as an equivalent. Applicants respectfully traverse this rejection for a number of reasons. The cited passage in Grace does not indicate creation of a second relationship view based on selection with respect to a first relationship view as recited by claim 8. For example, Grace includes a summary window 606. However, the summary window 606 in Grace does not enable selection of a particular icon and, based on the selection, generation of

another relationship view including the selected icon as well as neighboring resources.

The office action also cites FIG. 3-5 of Benhase and FIG. 19 of Chang. There is no discussion or showing (in this cited prior art) of selection of an icon and presenting a different relationship view in another region of a display screen as in the claimed invention. Accordingly, Applicants respectfully request allowance of claim 8 as well as claim 12.

Claim 9 recites "wherein the second relationship view is generated in response to a viewer dragging and dropping the particular icon from the first area to the second area of the display screen." The office action merely states that paragraph 35 of Grace includes an equivalent to the claimed invention. Applicants respectfully submit that merely disclosing that a computer system can include a device to change the status of a program as in the cited passages of Grace is not equivalent to the limitation as recited by claim 9. For example, claim 9 recites a very specific action for creating a relationship view resources in a respective storage area network environment. The cited passage provides no indication that the specific act of dragging and dropping can produce a relationship view. The office action also cites FIG. 3-5 of Benhase and FIG. 19 of Chang. There is no discussion or showing of dragging or dropping of icons as recited by claim 9. Accordingly, Applicants respectfully request allowance of claim 9.

Claim 10 recites "maintaining the display screen to include a third area to display a vertical hierarchy of managed entities associated with the storage area network; providing selectable input fields in relation to entries in the vertical hierarchy for selection of a managed entity in the storage area network; and in response to detecting selection of a particular entry in the vertical hierarchy, generating the first relationship view from the perspective of a corresponding

selected managed entity." The office action recites that paragraph 12 of Grace includes an equivalent to the claimed invention. Applicants respectfully submit that generation of an event log or summary view as in Grace is not equivalent to creation of a relationship view as in the claimed invention. More specifically, generation of an event log is not equivalent to generation of a relationship view including columns of icons and corresponding relationship paths as recited by claim 10. The summary view in Grace also does not recite the format of the relationship view as recited by the claimed invention. The office action also cites FIG. 3-5 of Benhase and FIG. 19 of Chang. There is no discussion or showing of the limitations in these newly cited references. Accordingly, Applicants respectfully request allowance of claim 10.

Claim 11 recites "maintaining a database of objects identifying relationships between the managed entities via collection of information from agents distributed throughout the storage area network." The office action recites that paragraphs 11 and 13 of Grace includes an equivalent to the claimed invention. Applicants respectfully submit that Grace may happen to disclose that a given process determines what devices are present in a network as indicated in the office action. However, there is no indication that the teachings of Grace include maintaining a database of information via collection of information from agents distributed throughout a respective storage area network environment. The office action also cites FIG. 3-5 of Benhase and FIG. 19 of Chang. Applicants respectfully submit that there is no discussion or showing of the limitations as recited by claim 11. Accordingly, Applicants respectfully request allowance of claim 11.

Claim 12 recites "maintaining a display screen to include an area to display a vertical hierarchy of managed entities associated with the storage area network; providing selectable input fields in relation to entries in the vertical hierarchy for selection of a managed entity in the storage area network; and

in response to detecting selection of a particular entry in the vertical hierarchy, generating the first relationship view from the perspective of a corresponding selected managed entity." The office action recites that paragraph 12 of Grace includes an equivalent to the claimed invention. However, Applicants respectfully submit that generation of an event log or a summary view of resource parameters as in Grace is not equivalent to creation of a relationship view as in the claimed invention. More specifically, generation of an event log is not equivalent to generation of a relationship view including columns of icons and corresponding relationship paths as recited by claim 12. Nor is merely displaying attributes associated with a selected resource. Thus, selection of an resource entry in a hierarchical tree does not produce a relationship view for the selected resource entry as recited by claim 12. The office action also cites FIG. 3-5 of Benhase and FIG. 19 of Chang. There is no discussion regarding the claim limitation as recited by claim 12. Accordingly, Applicants respectfully request allowance of claim 12.

Applicants respectfully submit that dependent claims 16-21 include further distinctions over the cited prior art. For example, dependent claim 16 recites "in relation to a first icon of the multiple icons, maintaining a visual region associated with the first icon to receive input commands from a user indicating to expand and display hidden attributes associated with a corresponding managed entity associated with the first icon." The office action recites that paragraph 12 of Grace includes an equivalent to the claimed invention. This paragraph reads as follows:

> [0012] Network parameters, such as the devices coupled to the network and the configurations of such devices, can be displayed in various ways under the invention. For example, such information can be displayed in diagram form or in table form. In a preferred embodiment, the graphical user interface includes an expandable tree diagram of expandable symbols that can be navigated to explore

> the structure of a network. As an example, the tree diagram can be one of a series of windows that make up the user interface as a whole. In various possible embodiments, other portions of the user interface (e.g., windows) can include a summary of a symbol of the tree diagram that is selected by a user, and an event log displaying a running history of network connectivity and configuration changes that are detected. Various possible embodiments may include other features as described herein, either alone or in combination.

Applicants respectfully submit that this passage in Grace and cited text merely discloses that an expandable tree diagram of expandable icons can be used to explore the structure of a network. This is not what Applicants claim as there invention. In contradistinction to this teaching, the claimed invention is directed towards enabling navigation amongst adjacent columns of icons having corresponding relationship paths between columns. Thus, contrary to the observation provided in the office action, the cited reference does not disclose the claimed invention.

The office action also cites FIG. 3-5 of Benhase and FIG. 19 of Chang. There is no discussion regarding the claim limitations as recited by claim 16. Accordingly, Applicants respectfully request allowance of claim 16.

With respect to dependent claim 17, creating an event log or summary of a symbol of the tree as disclosed in Grace is not equivalent to displaying relationship paths in a relationship view of columns of managed entities as in the claimed invention. Accordingly, for similar reasons as discussed above, Applicants respectfully submit that the rejection is improper and request allowance of claim 17.

Claim 18 recites "displaying a graphical container encompassing the first icon and the expanded relationship view of the managed entity associated with the first icon to indicate that the additional icons and corresponding managed entities are related to the first icon and corresponding managed entity." The office action recites that paragraph 12 of Grace includes an equivalent to the claimed invention. This paragraph reads as follows:

> [0012] Network parameters, such as the devices coupled to the network and the configurations of such devices, can be displayed in various ways under the invention. For example, such information can be displayed in diagram form or in table form. In a preferred embodiment, the graphical user interface includes an expandable tree diagram of expandable symbols that can be navigated to explore the structure of a network. As an example, the tree diagram can be one of a series of windows that make up the user interface as a whole. In various possible embodiments, other portions of the user interface (e.g., windows) can include a summary of a symbol of the tree diagram that is selected by a user, and an event log displaying a running history of network connectivity and configuration changes that are detected. Various possible embodiments may include other features as described herein, either alone or in combination.

Applicants respectfully submit that this passage in Grace and cited text merely discloses that an expandable tree diagram of expandable icons can be used to explore the structure of a network. The summary of the symbol selected from the expandable tree does not include a relationship view of columns of icons and corresponding relationship paths. In other words, the summary display 606 in FIG. 6 of Grace does not illustrate any relationship paths between managed entities as recited by the claimed invention. Thus, the cited passage is not equivalent to what Applicants claim as there invention. Instead, the claimed invention is directed towards selection of one or more entries in a hierarchical tree, generation of a navigable relationship view of columns of resources

associated with the selected managed entity. The viewer therefore can select a managed entity from a hierarchical tree and thereafter navigate amongst a relationship view associated with the selected managed entity. Thus, contrary to the office action, the cited reference does not disclose the claimed invention. Accordingly, Applicants respectfully request allowance of claim 18.

With respect to claim 19, merely stating that the storage area network in Grace is a simplified view (as opposed to a more complex view) is not equivalent to "displaying nested graphical containers encompassing different sets of icons to delineate corresponding functional components associated with a host server of the storage area network." Accordingly, Applicants respectfully request allowance of claim 19 over the cited prior art.

In a similar vein as discussed above for claim 20, merely stating that the storage area network in Grace is a simplified view (as opposed to a more complex view) is not equivalent to "displaying a first graphical container encompassing icons representing managed entities associated with a host server of the storage area network; displaying a second graphical container encompassing icons representing managed entities associated with a storage device of the storage area network; and displaying relationship paths between icons in the first graphical container and icons in the second graphical container to indicate a device mapping between the host server and the storage device." Accordingly, Applicants respectfully request allowance of claim 20 over the cited prior art.

For similar reasons that claim 13 is allowable, claim 21 also should be in condition for allowance over the cited prior art.

For similar reasons as discussed above for dependent claims 16-21, dependent claims 36-42 should be in condition for allowance as well.

New claims 52-55

Support for newly submitted claims 52-55 can be found throughout the specification including FIGS. 4, 8, and 11, and corresponding text in the subject application. Applicants respectfully submit that these claims further distinguish the invention in claim 1 over the cited art as they include techniques not found in any of the cited references.

Applicants respectfully request allowance of new claims 52-55 as well as the other pending claims.

CONCLUSION

In view of the foregoing remarks, Applicants submit that the pending claims as well as newly added claims are in condition for allowance. A Notice to this affect is respectfully requested. If the Examiner believes, after reviewing this Response, that the pending claims are not in condition for allowance, the Examiner is respectfully requested to call the Representative below.

Applicants hereby petition for any extension of time which is required to maintain the pendency of this case. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 50-3735

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